

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF ARIZONA**

John Lacour III,)	
)	
Plaintiff,)	MDL Case No. 2:15-md-02641-DGC
)	
v.)	Civil Action No. CV-18-01290-PHX-DGC
)	
Bard Peripheral Vascular, Inc. and C. R.)	
Bard, Inc., et al.,)	
Defendant.		

STIPULATION OF DISMISSAL

Plaintiff, John Lacour, III, and Defendants, Bard Peripheral Vascular, Inc. and C. R. Bard, Inc., et al, file this Stipulation of Dismissal because:

Plaintiff, John Lacour, III recently discovered that his IVC Filter, that forms the basis of his complaints in this litigation, was not manufactured by any of the Bard Defendants. His IVC Filter was manufactured by Argon Medical Option Elite.

Plaintiff has filed his IVC Filter claim with another MDL pending in Philadelphia, Pennsylvania. Plaintiff, John Lacour, III agrees not to pursue any claims against any of the Bard Defendants herein and not to re-file his claim in this MDL.

Accordingly, the parties agree to dismiss all of Plaintiff, John Lacour, III's claims **without prejudice** as to any claims John Lacour, III may have against Argon Medical Option Elite.

Costs of Court shall be taxed against the party incurring same.

Date: June 25, 2018

Respectfully submitted,

/s/ John T. Kirtley, III
FERRER, POIROT & WANSBROUGH
John T. Kirtley, III
Texas Bar No. 11534050
2603 Oak Lawn Avenue, Suite 300
P.O. Box 199109
Dallas, Texas 75219
(214) 521-4412 - Phone
(214) 526-6026 Fax
jkirtley@lawyerworks.com
(Asst. molvera@lawyerworks.com)
Attorney-in-charge for Plaintiff,
John Lacour, III

/s/ Richard B. North, Jr.
Richard B. North, Jr. (Ga. Bar No. 545599)
Nelson Mullins Riley & Scarborough, LLP
201 17th St., NW, Suite 1700,
Atlantic Station, Atlanta, GA 30363
(404) 322-6000 - Phone
(404) 322-6050 - Fax
richard.north@nelsonmullins.com
Attorney-in-charge for Defendants